

Hearing Date: July 9, 2025 at 2:00 p.m. (prevailing Eastern Time)
Objection Deadline: July 3, 2025 at 4:00 p.m. (prevailing Eastern Time)
Reply Deadline: July 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

BARCLAY DAMON LLP

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Counsel to Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
ST. CHRISTOPHER'S, INC., et al., ¹	:	Case No. 24-22373 (shl)
	:	Main Case
Debtors.	:	Jointly Administered

NOTICE OF DEBTORS' MOTION FOR ENTRY OF ORDERS (I) AMENDING THE DIP LOAN AND (II) CLARIFYING THE DOBBS FERRY SALE ORDER TO FACILITATE THE CLOSING OF THE DOBBS FERRY SALE

PLEASE TAKE NOTICE that on June 23, 2025, Barclay Damon LLP, as counsel for the debtors and debtors-in-possession, filed the *Debtors' Motion for Entry of Orders (I) Amending the DIP Loan and (II) Clarifying the Dobbs Ferry Sale Order to Facilitate the Closing of the Dobbs Ferry Sale* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **July 9, 2025 at 2:00 p.m. (prevailing Eastern Standard Time)** (the “Hearing”) before the Honorable

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: St. Christopher's, Inc. (0485) and The McQuade Foundation (2652).

Judge Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that participants can attend the Hearing in person or via the Zoom for Government platform. Participants in the Hearing are required to register their appearance before the hearing utilizing the e-Court Appearances tool at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained free of charge by contacting the undersigned counsel. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or a later hearing.

PLEASE TAKE FURTHER NOTICE that any response or objection (together, the “Objections”) to the Motion shall be in writing, shall comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at <https://www.nysb.uscourts.gov>), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399 so as to be received by: the Bankruptcy Court, US Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004-1408; the Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green,

Room 534, New York, New York 10004-1408, Attn: Paul Schwartzberg, Esq.,
Paul.Schwartzberg@usdoj.gov; the Subchapter V Trustee, Heidi J. Sorvino, Esq., White and
Williams LLP, 810 Seventh Avenue, Suite 500, New York, New York 10019,
Sorvinoh@whiteandwilliams.com; and the undersigned counsel no later than **4:00 p.m.**
(prevailing Eastern Standard Time) on July 3, 2025.

PLEASE TAKE FURTHER NOTICE that any replies in further support of the Motion
and the relief requested (the “Replies”) shall be in writing, shall comply with the Federal Rules of
Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York,
shall be filed with the Bankruptcy Court by attorneys practicing in the Bankruptcy Court, including
attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which
can be found at <https://www.nysb.uscourts.gov>), in accordance with the customary practices of the
Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in
accordance with General Order M-399 so as to be received by: the Bankruptcy Court, US
Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York
10004-1408; the Office of the United States Trustee, Alexander Hamilton Custom House, One
Bowling Green, Room 534, New York, New York 10004-1408, Attn: Paul Schwartzberg, Esq.,
Paul.Schwartzberg@usdoj.gov; the Subchapter V Trustee, Heidi J. Sorvino, Esq., White and
Williams LLP, 810 Seventh Avenue, Suite 500, New York, New York 10019,
Sorvinoh@whiteandwilliams.com; the objecting parties, if any, and the undersigned counsel no
later than **4:00 p.m. (prevailing Eastern Standard Time) on July 7, 2025.**

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend
the Hearing, and failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Debtors may, after the Hearing, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or opportunity to be heard.

Dated: June 24, 2025
New York, New York

BARCLAY DAMON LLP

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